

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:)	Chapter 9
)	
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	
Debtor.)	Hon. Steven W. Rhodes
)	

**LIMITED RESPONSE OF THE DETROIT RETIREMENT SYSTEMS
TO THE ORDER REGARDING ADJOURNED STATUS CONFERENCE**

The Police and Fire Retirement System of the City of Detroit (the “PFRS”) and the General Retirement System of the City of Detroit (the “GRS” and together with the PFRS, the “Retirement Systems”) hereby file this limited response (the “Response”) to the Order Regarding Adjourned Status Conference [Dkt. No. 5020] (the “Status Conference Order”), stating as follows:

Limited Response

1. The City, the Retirements Systems, and others, have reached agreements or agreements in principle regarding the treatment of Pension Claims¹ provided that both Classes 10 and 11 vote to accept the Plan and the funding contemplated by the State Contribution Agreement and the DIA Settlement is

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Fourth Amended Plan for the Adjustment of Debts of the City of Detroit (May 5, 2014) [Dkt. No. 4392] (the “Plan”).

actually committed, subject to the fulfillment of the conditions that accompany such funding. *See* Recital A of Stipulation attached as Exhibit A to the Notice of Proposed Order Approving Stipulation Modifying Certain Deadlines Established in the Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtors' Plan of Adjustment [Dkt. No. 4563].

2. On May 9, 2014, the Court entered the Order Approving the Stipulation Modifying Certain Deadlines Established in the Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtors' Plan of Adjustment [Docket No. 4202] [Dkt. No. 4587] (the "Order Modifying Plan Scheduling Order").

3. The Order Modifying Plan Scheduling Order modifies the deadline for the Retirement Systems, and other parties to the Stipulation, to serve and file objections to the Plan, and to take other actions.

4. Pursuant to the Order Modifying Plan Scheduling Order, the Retirement Systems have not yet filed or served Plan objections.

5. On May 23, 2014, the Court entered the Status Conference Order requiring "the City and each objecting creditor" to "present to the Court a summary of the evidence as it relates to each of the requirements for plan confirmation on which it takes a position."

6. Because the Retirement Systems have not yet filed a Plan objection, they believe that they are not an “objecting party” that is subject to the Status Conference Order and that they are not required to present a summary of the evidence as it relates to each of the requirements for plan confirmation on which they take a position.

7. If the Retirement Systems misunderstand and are subject to the Status Conference Order, they object to the Status Conference Order to the extent that it will force the Retirement Systems to take a position on certain issues prematurely and could prejudice the Retirement Systems’ rights to be heard on an issue, before the Retirement Systems can reasonably determine whether they will be objecting creditors.

8. The Retirement Systems hereby reserve all rights to object to the Plan on any and all grounds. The Retirement Systems also reserve all rights to present a summary of the evidence as it relates to each of the requirements for plan confirmation on which it will take a position.

Dated: May 27, 2014

Respectfully submitted,

CLARK HILL PLC

/s/ Robert D. Gordon

Robert D. Gordon (P48627)

Shannon L. Deeby (P60242)

Jennifer K. Green (P69019)

151 South Old Woodward Avenue

Suite 200

Birmingham, Michigan 48009

Telephone: (248) 988-5882

Facsimile: (248) 988-2502

rgordon@clarkhill.com

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:)	Chapter 9
)	
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	
Debtor.)	Hon. Steven W. Rhodes
)	

CERTIFICATE OF SERVICE

The undersigned certifies that on May 27, 2014, the *Limited Response of the Detroit Retirement Systems to Order Regarding Adjourned Status Conference* was filed using the Court's CM/ECF system, which CM/ECF system will send notification of such filing to all parties of record.

CLARK HILL PLC

/s/ Robert D. Gordon

Robert D. Gordon (P48627)
151 South Old Woodward Avenue, Suite 200
Birmingham, Michigan 48009
Telephone: (248) 988-5882
rgordon@clarkhill.com

Dated: May 27, 2014

*Counsel to the Police and Fire Retirement
System of the City of Detroit and the General
Retirement System of the City of Detroit*